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May 16, 2023

Honorable LaShann DeArcy Hall
United States District Judge for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Derrick Taylor*, 22 Cr. 311 (LDH)

Hon. DeArcy Hall,

With consent of the government, I write to respectfully request a continuance of the May 17, 2023, status conference in this case to a date convenient to the Court and the parties. I request this relief because I am currently in the middle a multi-week trial in a complicated terrorism matter, *United States v. Trabelsi*, 06-CR-089-RDM (D.C. Cir.).

Should the Court grant this request, I agree that the time is properly excluded under the Speedy Trial Act. To that end, we request that the time between May 17, 2023 and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(1)(D) and 3161 (h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because, among other things, it will allow the government and defense counsel for each defendant to continue to review discovery, continue discussions regarding a possible disposition in the matter, or in the alternative responsibly prepare for trial.

While the government consents, I have not been able to reach counsel for Mr. Frank Liu and am unaware if he seeks a similar continuance.

I thank the court for its time and consideration of this matter.

Respectfully submitted,

/s/Sabrina P. Shroff
Attorney for Derrick Taylor

cc: Edgar Fankbonner & Paul Goldberger